



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OFFICE OF
ENVIRONMENTAL CLEANUP

JUL 30 2010

Lieutenant Colonel Kris N. Perkins
US Army Commander
Umatilla Chemical Depot
Hermiston, Oregon 97838-9544

Dear Lieutenant Colonel Perkins:

The U.S. Environmental Protection Agency (EPA) has reviewed the March 2010 Five Year Review for the Umatilla Chemical Depot (UMCD) Federal Facility. EPA is encouraged by the progress UMCD has made in implementing the recommendations set forth in the previous Five Year Review, published in 2004, and acknowledges the efforts of the Federal Facility Agreement (FFA) project team.

EPA reviewed the document for technical adequacy, accuracy, and consistency. The document provides a clear summary of the status and the protectiveness of the four individual UMCD operable units which required review. It also identifies actions to be taken that affect the protectiveness of the selected remedy and documents a schedule for completion of the recommended actions (see Table 9 of the Five Year Review).

Based on EPA's review of the 2010 Five Year Review, reports referenced in the document, and our expectation that the recommendations set forth in Table 9 will be completed in accordance with the schedule, EPA concurs with Army's determinations and recommendations except as noted below.

EPA concurs that the remedy at Site 39 is protective of human health and the environment because all media preventing unlimited use and unrestricted exposure have been removed. Furthermore, EPA concurs that the remedy at the Active Landfill Operable Unit (OU) currently protects human health and the environment because all known Landfill-related contaminants of concern, with the possible exception of selenium which pose risk, are below regulatory levels and because, although selenium in groundwater is elevated, there is currently no complete exposure pathway for groundwater. However, for the remedy to be protective in the long-term, deed restrictions may be required preventing use of groundwater resources within and downgradient of the elevated selenium area once the property is transferred from Army ownership under the Base Realignment and Closure (BRAC) program.

For the Explosives Washout Lagoons (EWL) Groundwater OU, EPA concurs that the remedy is operating and is expected to be protective upon completion of the remedial action, recommendations and follow-up actions, and in the meantime, because this is an operating military reservation, there are controls in place to prevent unacceptable exposure. However, while the EWL selected remedy called for Institutional Controls (ICs) to be put in place to

prevent access to contaminated groundwater until such time as cleanup levels are met, the Five Year Review speaks only to ICs prohibiting excavation, controls preventing exposure to contaminated groundwater are not in place, and the Protectiveness Statement says only that "prohibition on the use of GW will be required." In addition to other follow-up actions identified in the document, the Army needs to take action to establish such a prohibition as soon as possible, and ensure the restrictions remain in place and effective as long as necessary, particularly if the property is transferred under the BRAC program.

Similarly, for the Ammunition Demolition Activity (ADA) OU EPA concurs that the remedy at the ADA OU is protective of human health and the environment in the short-term because controls are in place to prevent exposure to the remaining MEC and because this is an operating military reservation. However, the Five Year Review Protectiveness Statement makes reference to groundwater ICs, but such controls preventing exposure to contaminated groundwater are not in place. In addition to other follow-up actions identified in the document, the Army needs to take action to establish such a prohibition as soon as possible, and ensure the restrictions remain in place and effective as long as necessary, particularly if the property is transferred under the BRAC program.

EPA looks forward to working with UMCD on implementing the two recommendations above and the other recommended actions to ensure protectiveness identified in Table 9 of the 2010 Five Year Review.

If you have questions concerning this letter, please call me at (206) 553-1855, or contact the site manager, Harry Craig, by phone at (503) 326-3689 or by email at craig.harry@epa.gov.

Sincerely,

A handwritten signature in dark ink, appearing to read "Dan Opalski", written in a cursive style.

Daniel D. Opalski, Director
Office of Environmental Cleanup

cc: David Anderson, Oregon DEQ

Bill Hansell
LRA Chairman

Mark Daugherty, UMCD